

Exhibit F

to Movant's Motion to Quash

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 CASE NO. 1:20-CV-20961-KMW
4

SILVA HARAPETIAN

5 and other similarly situated individuals,
6 Plaintiff,

7 vs.

8 CBS TELEVISION STATIONS, INC.

and CBS BROADCASTING, INC.,

9 Defendant.
10 _____/

11
12
13
14 Miami, Florida

Tuesday, 10:04 A.M.-1:30 P.M.

15 June 15, 2021
16

17 VIDEOCONFERENCE DEPOSITION OF ADAM LEVY
18

19 Taken before Carla D. Smith, RPR, RMR, Notary Public
20 in and for the State of Florida at Large, pursuant to
21 Notice of taking Deposition in the above cause.
22
23
24
25

1 APPEARANCES:

2 ATTORNEYS FOR PLAINTIFF

3 Remer & Georges-Pierre, P.A.

4 44 West Flagler Street

Suite 2200

5 Miami, FL 33130

6
7 BY: PETER M. HOOGERWOERD, ESQUIRE

pmh@rgpattorneys.com

8 CRISTOBAL BOBADILLA-GAMBOA, ESQUIRE

9
10 ATTORNEYS FOR DEFENDANT

11 Baker & McKenzie LLP

452 Fifth Avenue

12 New York, NY 10018

13 BY: BLAIR J. ROBINSON

blair.robinson@bakermckenzie.com

14 BENJAMINE C. DAVIS, ESQUIRE

benjamin.davis@bakermckenzie.com

15
16 Also Present:

17 Silva Harapetian, Plaintiff

18 Michelle Vachris, Associate General Counsel CBS

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EXHIBITS

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Exhibit 2	E-mail from Gary Nelson Re:	59
	Resending dated 9/18/18	
Exhibit 3	E-mail from Gary Nelson Re: CBS ...	65
	Investigation dated 10/2/18	

1 THE COURT REPORTER: Due to the need for
2 this deposition to take place remotely because of
3 the Government's order for social distancing, the
4 parties will stipulate that the court reporter
5 may swear in the witness via videoconference and
6 that the witness has verified he is fact, in
7 fact, Adam Levy.

8 Is there a stipulation by the parties?

9 MR. ROBINSON: Yeah. We agree to that.

10 MR. HOOGERWOERD: Yes. We agree to that.

11 DIRECT EXAMINATION

12 BY MR. HOOGERWOERD:

13 Q. Good morning, Mr. Levy.

14 My name is Peter Hoogerwoerd. We are here to
15 take your deposition for consolidation purposes in two
16 cases; Silva Harapetian, her discrimination case and
17 also her Fair Labor Standard Act case which are two
18 separate case numbers.

19 I'm going to lay some ground rules. Have you
20 had your deposition taken before, Mr. Levy?

21 A. Yes.

22 Q. Do you remember what that was for?

23 A. Yes.

24 Q. What was that for?

25 A. What case was it for?

1 you send the pilot for Tracy to see?

2 A. Tracy works for the station division.

3 Q. CBS Television Stations Group?

4 A. I think that's the name of it.

5 Q. Okay.

6 A. That runs the TV stations.

7 Q. Was there ever a time you were working for
8 CBS at WFOR TV?

9 A. Yes.

10 Q. When did you start working for WFOR-TV?

11 A. November of 2010.

12 Q. What was your job title when you started at
13 WFOR?

14 A. General manager.

15 Q. Have you always held the same title?

16 MR. ROBINSON: While he was at CBS?

17 BY MR. HOOGERWOERD:

18 Q. While you were at WFOR?

19 A. Yes.

20 Q. And I imagine at some point you left WFOR-TV?

21 A. Yes.

22 Q. Why did you leave?

23 A. My employment was terminated.

24 Q. What's your understanding why you were
25 terminated from WFOR-TV?

1 A. The explanation I was given was that they
2 were going in a different direction.

3 Q. Who provided that explanation to you?

4 A. Peter Dunn.

5 Q. Was there an interim general manager or
6 station manager after you left?

7 A. My understanding was that Peter Dunn acted as
8 the interim general manager.

9 Q. Do you know for what period of time?

10 A. I don't know specifically.

11 Q. When you left CBS -- I'm sorry. Hang on one
12 second.

13 When you left WFOR-TV, who did you report to?

14 A. Are you asking me at the time I left who did
15 I report to?

16 Q. Yes, sir.

17 A. Peter Dunn.

18 Q. Did you ever report to David Friend?

19 A. No.

20 Q. Other than Peter Dunn, did you report to
21 anybody else?

22 A. No.

23 Q. What was Peter Dunn -- strike that.

24 How long did you report to Peter Dunn?

25 A. 10 years.

1 A. Yes.

2 Q. And without telling me anything other than a
3 yes or no answer to this question, does that agreement
4 contain a confidentiality provision?

5 A. As far as I know, yes.

6 Q. Okay. We're approaching the end of my line
7 of questioning.

8 Do you have a recollection now after sometime
9 has passed as to who was the manager of the assignment
10 desk?

11 A. Yes. Her first name is Anastasia and I still
12 can't remember her last name.

13 Q. Has all your testimony been truthful here
14 today, sir?

15 A. It has.

16 MR. HOOGERWOERD: Blair, do you have
17 anything?

18 MR. ROBINSON: I have a few.

19 CROSS-EXAMINATION

20 BY MR. ROBINSON:

21 Q. Have you had any discussions with Peter Dunn
22 about Silva Harapetian?

23 A. I'm sorry, Blair. You broke up there.

24 Q. Sure.

25 Have you had any discussions with Peter Dunn

1 about Silva Harapetian at any point in time?

2 A. No.

3 Q. Have you had any discussions with David
4 Friend at any point in time about Silva Harapetian?

5 A. No.

6 Q. Do you have any information to suggest that
7 Peter or David were consulted on any employment
8 decisions involving Silva Harapetian?

9 A. No.

10 Q. To your knowledge, was Peter Dunn involved in
11 the hiring of per diem reporters at WFOR?

12 A. No.

13 Q. To your knowledge, was David Friend involved
14 in the hiring of per diem employees at WFOR?

15 A. No.

16 Q. To your knowledge, was Peter Dunn involved in
17 decisions about what to pay per diem reporters or
18 producers at WFOR?

19 A. No.

20 Q. To your knowledge, was David Friend involved
21 in decisions about what to pay per diem reporters or
22 producers at WFOR?

23 A. No.

24 MR. ROBINSON: I have no further questions.

25

REDIRECT EXAMINATION

BY MR. HOOGERWOERD:

Q. Sir, you were not privy to any of the conversations between Liz Roldan and David Friend, correct?

A. No.

Q. And same question for Peter Dunn. You were not privy to any of the conversations that Liz Roldan may have had with Peter Dunn?

A. No.

MR. HOOGERWOERD: Read or waive?

MR. ROBINSON: We'll read and sign.

MR. HOOGERWOERD: Okay. We'll order an electronic mini and if you can send me, Carla, your e-mail address in the chat so I can send you the exhibits.

(This deposition was concluded at 1:30 P.M.)